

**SEALED**

UNITED STATES DISTRICT COURT

United States Courts  
Southern District of Texas  
FILED

SOUTHERN DISTRICT OF TEXAS

JUN 12 2019

CORPUS CHRISTI DIVISION

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

JONATHAN RODRIGUEZ  
CONSUELO GARCIA  
ASHLEY MUNOZ  
JOHN ZAPATA

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CRIMINAL NUMBER

**C-19-656**

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between on or about March 28, 2018, and on or about May 23, 2019, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

JONATHAN RODRIGUEZ,  
CONSUELO GARCIA,  
ASHLEY MUNOZ,  
and JOHN ZAPATA,

did knowingly and intentionally conspire and agree, together, with each other, and other persons known and unknown to the Grand Jury, to possess with intent to distribute more than five hundred (500) grams of a mixture or substance containing a detectable amount of cocaine, that is, approximately six hundred sixty-two and forty-seven hundredths (662.47) (gross weight) grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

COUNT TWO

Between on or about March 28, 2018, and on or about May 23, 2019, in the Corpus Christi Division of the Southern District of Texas and within the jurisdiction of the Court, the defendants,

JONATHAN RODRIGUEZ,  
CONSUELO GARCIA,  
ASHLEY MUNOZ,  
and JOHN ZAPATA,

did knowingly and intentionally conspire and agree, together, with each other, and other persons known and unknown to the Grand Jury, to possess with intent to distribute more than twenty-eight (28) grams of a mixture or substance containing cocaine base (also known as crack cocaine), that is, approximately forty-nine and sixty-seven hundredths (49.67) grams of a mixture or substance containing cocaine base (also known as crack cocaine), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

NOTICE OF CRIMINAL FORFEITURE

[Title 21, United States Code, Section 853]

Pursuant to Title 21, United States Code, Section 853, the United States gives notice to the defendant,

JONATHAN RODRIGUEZ,  
CONSUELO GARCIA,  
ASHLEY MUNOZ,  
and JOHN ZAPATA,

that upon conviction of Count One or Count Two charged in this Indictment, the following is subject to forfeiture:

- (1) all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense;

- (2) all property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense;
- (3) \$13,072.00 in U.S. Currency seized on or about May 12, 2019; and,
- (4) \$1,262,375.00 in U.S. Currency seized on or about May 23, 2019.

**MONEY JUDGMENT AND SUBSTITUTE ASSETS**

The United States may seek the imposition of a money judgment against the defendants. Defendants are notified that in the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendants up to the total value of the property subject to forfeiture.

A TRUE BILL:  
ORIGINAL SIGNATURE ON FILE  
FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK  
UNITED STATES ATTORNEY

By:

  
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DAVID M. PAXTON  
Assistant United States Attorney